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April 23, 2013

Mary Nichols, Chair California Air Resources Board 1001 I Street, PO BOX 2815 Sacramento, CA 95812

SUBJECT:

COMMENTS ON DRAFT CAP AND TRADE AUCTION PROCEEDS

**INVESTMENT PLAN** 

Dear Ms. Nichols:

The Bay Area Biosolids to Energy Coalition (BAB2E) is encouraged by the initial Draft Investment Plan for Cap and Trade Auction Proceeds and wishes to submit the following comments in response to the draft plan.

The BAB2E is a coalition of 19 Bay Area Wastewater Agencies that are already capturing methane gas through anaerobic digestion. However, energy value still remains in the biosolids after digestion. The BAB2E agencies are currently exploring opportunities to diversify biosolids management options with the development of a regional facility or facilities that will use biosolids to generate renewable energy and/or transportation fuel. Locating a regional facility within the Bay Area would have the added benefit of reducing vehicle miles, currently estimated to exceed 800,000 miles per year, and the greenhouse gas emissions associated with hauling.

With that goal in mind, the BAB2E supports the ideas put forth in Appendix B9, B10 and B15 regarding grants for wastewater to energy. However, the investment plan makes no mention of biosolids and only refers to biogas and biomethane. Given the energy and clean fuel potential of biosolids, we would encourage the California Air Resources Board to specifically mention biosolids in the investment plan.

Sincerely,

Caroline Quinn, Project Manager Bay Area Biosolids to Energy Coalition

CQ:ck

cc:

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